

In the Matter of)
)
Inquiry Regarding Carrier)
Current Systems, including) ET Docket No. 03-104
Broadband Over Powerline Systems)
)

³ See www.arrl.org/tis/info/rfite1jx.html

5. Comment: "If anything, the existing rules may be too stringent and unnecessarily limit the range of BPL, but certainly the emission limits do not need to be reduced to prevent interference". ¶III.B.

6. Reply: The UPLC provided no evidence to support this statement and should be considered conjecture. On the other hand, the American Radio Relay League provides solid evidence supporting its conclusion that Part 15 limits should be reduced. "The attached technical studies and the foregoing argument demonstrate that (1) BPL at HF and low VHF is incompatible with incumbent Amateur operation, and (2) that the existing radiated emission levels permitted by Part 15 are too high, and would permit widespread interference to Amateur HF and VHF stations¹".

7. Comment: "Some trials of Access BPL systems do in fact use devices designed for In-House BPL use, and any unintended migration of the signal would be so faint that there would be no potential for interference". ¶III.B.

8. Reply: Again, this is conjecture not supported by the facts and should be disregarded by the Commission.

9 Comment: "The UPLC believes that the existing Part 15 rules for low speed carrier current systems do adequately protect authorized users of the spectrum that are in the bands used by BPL systems". ¶III.B.

10. Reply: I refer the Commission again to the wireless cable modem problems and ensuing time and effort by the FCC to clean up these interference cases (paragraph 4 above). This is evidence that, in some cases, Part 15 rules do NOT protect authorized users.

In closing let me quote FCC Chairman Michael K. Powell from a recent Washington Post article. ". . . it is one of my top priorities . . . to ensure that public safety has the reliable spectrum resources it needs to do its lifesaving work²". I urge the Commission to protect amateur radio now and avoid a massive and expensive cleanup later.

Respectfully Submitted

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¹ See COMMENTS OF ARRL, THE NATIONAL ASSOCIATION FOR AMATEUR RADIO, ¶II.21.

² FCC Vows To Fix Interference, August 18, 2003,
www.washingtonpost.com/ac2/wp-dyn/A7270-2003Aug17